

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC.  
PRODUCTS LIABILITY LITIGATION

MDL No. 2419  
Master Docket:  
1:13-md-2419-  
RWZ

v.

This Document Relates To:

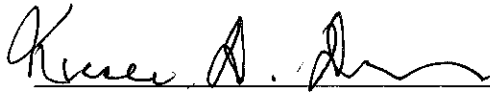
*Tallman*, 1:13-cv-10349; *Landon*, 1:13-cv-10352; *Shrock*, 1:13-cv-10353; *Rethlake*, 1:13-cv-10354; *Oblinger*, 1:13-cv-10355; *Wyres*, 1:13-cv-10356; *Geisler*, 1:13-cv-10357; *Ginther*, 1:13-cv-10363; *Klemm*, 1:13-cv-10371; *Pavlekovich*, 1:13-cv-10373; *Copsey*, 1:13-cv-10503; *Tolbert*, 1:13-cv-10507; *Huff*, 1:13-cv-10511; *Craig*, 1:14-cv-12367; *Bostic*, 1:14-cv-12371; *Smith*, 1:14-cv-12531; *Lenhart*, 1:14-cv-12561; *Polk*, 1:14-cv-12573; *Pringle*, 1:14-cv-12574; *Elliott*, 1:14-cv-12597; *Alcozar*, 1:14-cv-12598; *Durben*, 1:14-cv-12599; *Frick*, 1:14-cv-12611; *Holden*, 1:14-cv-12616; *Wegner*, 1:14-cv-12619; *Wolfe*, 1:14-cv-12622; *Glon-Ullery*, 1:14-cv-12838; *Barnes*, 1:14-cv-12864; *Briggs*, 1:14-cv-12869; *Browning*, 1:14-cv-12872; *Hunt*, 1:14-cv-12875; *Lay*, 1:14-cv-12909; *Haas*, 1:14-cv-12912; *Konanz*, 1:14-cv-12913; *McClure*, 1:14-cv-12914; *Owen*, 1:14-cv-13006; *Pinneyei*, 1:14-cv-13010; *Robinson*, 1:14-cv-13011; *Pedler*, 1:14-cv-13012; *Probst*, 1:14-cv-13014; *Shafer*, 1:14-cv-13015; *Pletcher*, 1:14-cv-13016; *Soli*, 1:14-cv-13017; *Koziatek*, 1:14-cv-13018; *Jones*, 1:14-cv-13021; *McQueen*, 1:14-cv-13025; *Cookson*, 1:14-cv-13081; *Allen*, 1:14-cv-13082; *Garl*, 1:14-cv-13083; *Copp*, 1:14-cv-13084; *Pritchard*, 1:14-cv-13157; *Lawson*, 1:14-cv-13158; *Cobb*, 1:14-cv-13200; *Greenwood*, 1:14-cv-13202; *Grice*, 1:14-cv-13204; *Holt*, 1:14-cv-13206; *Hurst*, 1:14-cv-13207; *Ivory*, 1:14-cv-13209; *Sims*, 1:14-cv-13212; *Sinn*, 1:14-cv-13213; *Stokes*, 1:14-cv-13217; *VanSchoiack*, 1:14-cv-13218; *Dillon*, 1:14-cv-13220; *Rice*, 1:14-cv-13257; *Lock*, 1:14-cv-13262; *Reed*, 1:14-cv-13265; *Wilfing*, 1:14-cv-13267; *Yoe*, 1:14-cv-13268; *Vitou*, 1:14-cv-13294; *Tirotta*, 1:14-cv-13296; *Smith*, 1:14-cv-13304; *Robinson*, 1:14-cv-13307; *Kaser*, 1:14-cv-13322; *Hinkle*, 1:14-cv-13323; *Miller*, 1:14-cv-13324; *Kubiszewski*, 1:14-cv-13325; *Jackson*, 1:14-cv-13327; *Roark*, 1:14-cv-13329; *Romano*, 1:14-cv-13332; *Walter*, 1:14-cv-13335; *Rulli*, 1:14-cv-13411; *Behrens*, 1:14-cv-13412; *Tuff*, 1:14-cv-13413; *Frain*, 1:14-cv-13414; *Fortier*, 1:14-cv-13415; *Mohr*, 1:14-cv-13483; *Sieczko*, 1:14-cv-13484; *Surowiec*, 1:14-cv-13486; *Troxel*, 1:14-cv-13488; *Trost*, 1:14-cv-13489; *Redman*, 1:14-cv-13493; *Ross*, 1:14-cv-13494; *Reinhardt*, 1:14-cv-13495; *Jackson*, 1:14-cv-13661; *Pinkstaff*, 1:14-cv-13719; and *Calvo-Nelson*, 1:14-cv-13734; *Lambert*, 1:13-cv-10351.

**AFFIDAVIT OF NICOLE D. DORMAN, ESQ.**

I, Nicole D. Dorman, Esq., upon oath, do depose and say as follows:

1. I am an attorney licensed to practice law in the State of Connecticut, and I represent Liberty Industries, Inc. ("Liberty") in various matters.
2. On or about June 21, 2013, Liberty was served with a subpoena by the Plaintiffs' Steering Committee in the present action.
3. On July 29, 2013, I, on behalf of Liberty, responded to that subpoena and produced a CD containing at least 9921 pages of documents. The documents produced included all documents in Liberty's possession, custody, or control relating to the three cleanrooms that it designed and constructed for New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center ("NECC") and/or Ameridose in 2005, 2006, and 2008 at 697 Waverly Street, Framingham, MA ("NECC Facility").
4. The documents produced by Liberty in response to the subpoena included all documents pertaining to the work performed by Liberty at the NECC facility and all documents evidencing communications between Liberty and NECC and/or Ameridose and/or other contractors or subcontractors regarding work at the NECC facility.


SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 12<sup>th</sup> DAY OF  
NOVEMBER, 2014.

  
\_\_\_\_\_  
Nicole D. Dorman, Esq.

, ss.

November 12, 2014

On this 12<sup>th</sup> day of November, 2014, before me, the undersigned notary public, personally appeared Nicole D. Dorman, proved to me through satisfactory evidence of identification, which was CT Driver license, Visa card, to be the person whose name is signed on the preceding document who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his/her knowledge and belief.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 10/31/2018